

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

CHRISTOPHER C. DAVIDSON,

Plaintiff,

v.

DEUTSCHE BANK SECURITIES, INC.,
DEUTSCHE BANK AMERICAS
HOLDING CORPORATION,
and DEUTSCHE BANK AMERICAS
SEVERANCE PAY PLAN

Defendants.

Civil Action No. 1:04-cv-11027-RGS

PLAINTIFF'S STATEMENT FOR LOCAL RULE 16.1 CONFERENCE

I. DISCOVERY PLAN

The parties propose the following discovery plan:

- A. On or before **January 5, 2005**: Exchange of documents automatically disclosed.
- B. On or before **January 27, 2005**: Document requests served.
- C. On or before **February 26, 2005**: Documents produced.
- D. On or before **March 24, 2005**: Interrogatories served.
- E. On or before **April 30, 2005**: Interrogatory answers served.
- F. On or before **August 29, 2005**: Depositions of parties and fact witnesses completed and related supplemental document requests and interrogatories, if any, issued.
- G. On or before **October 10, 2006**: Designation of expert witnesses and related disclosures made.

- H. On or before **November 28, 2006**: Expert witness depositions (if any) completed and requests for admission served.

II. PROPOSED SCHEDULE FOR FILING MOTIONS

- A. Motion to Dismiss has been filed by Defendant.

III. PRETRIAL CONFERENCE

The parties propose a final pretrial conference in **April, 2005**.

IV. CERTIFICATIONS OF COUNSEL AND PARTIES

Certifications to this effect required by Local Rule 16.1(D)(3) have been filed separately.

V. OTHER MATTERS

Proposed agenda for the December 15, 2004 conference:

- A. Review of foregoing discovery plan and establishment of schedule.
- B. The parties do not consent to trial by a Magistrate Judge.
- C. The parties plan to prepare a statement of agreed facts in an attempt to resolve the case through early dispositive motions.



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